

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

ROBERT STOUD

Plaintiff

v.

SUSQUEHANNA COUNTY

Defendant

CIVIL ACTION

No. 3:17-CV-2183

MOTION TO CONTINUE TRIAL DATE

NOW COMES, the Plaintiff, Robert Stoud, by and through his attorneys,
and in support of this motion, aver as follows:

1. Trial in this matter is scheduled for September 28, 2020 (Doc. 82).
2. This Honorable Court previously issued an Order (Doc. 60) permitting the Plaintiff to conduct discovery limited to the allegations contained in the Giangrieco Complaint.
3. Plaintiff's counsel then sought to depose several witnesses under the control of defense counsel.
4. Defense counsel refused to produce the witnesses to be deposed.
5. At a pre-trial conference on September 23, 2020, defense counsel agreed to produce the witnesses for depositions.
6. On September 23, 2020, the undersigned contacted defense counsel seeking concurrence in this motion and defense counsel did not concur.

7. The depositions are necessary to prepare for trial.
8. Therefore, the undersigned are seeking a continuance of the trial date to take depositions of individuals with knowledge of the facts alleged in the Giangrieco Complaint.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court grant the continuance motion.

Respectfully Submitted:

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
Bar I.D. # PA 49625
gmk@mkpvlaw.com

/s/ Christopher J. Szewczyk, Esquire
Christopher J. Szewczyk, Esquire
Bar I.D. # PA 306689
cjs@mkpvlaw.com
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
P: (570) 348-0776
F: (570) 348-2755
Attorneys for the Plaintiff

Date: September 23, 2020

CERTIFICATE OF NON-CONCURRENCE

The undersigned hereby certifies that on September 23, 2020, he contacted

A. James Hailstone, Esquire requesting concurrence in the foregoing motion.

Attorney Hailstone does not concur in Plaintiff's request.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire
Mazzoni, Karam, Petorak, and
Valvano
321 Spruce Street
Suite 201
Scranton, PA 18503
(570) 348-0776

Dated: September 23, 2020

CERTIFICATE OF SERVICE

I, Gerard M. Karam, Esquire, hereby certify that I have served a true and correct copy of the foregoing document via electronic service/ECF system on the 23rd day of September, 2020.

/s/ Gerard M. Karam, Esquire
Gerard M. Karam, Esquire